



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**JAMES E. JOHNSON**  
*Corporation Counsel*

**OMAR J. SIDDIQI**  
*Senior Counsel*  
Tel.: (212) 356-2345  
Fax: (212) 356-3509  
osiddiqi@law.nyc.gov

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**VIA ECF**

Honorable Ramon E. Reyes  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

Re: Jennifer Padilla v. City of New York, et al.  
19-CV-3703 (RER)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants in the above-referenced matter. Defendants write to respectfully request that the Court extend the parties' deadline to file the status letter that was due today until February 5, 2021. Defendants have conferred with plaintiff who consents to this request.

The reason for the instant application is that defendants are still determining the status of the NYPD letter mentioned in plaintiff's letter dated January 19, 2021. The undersigned has been working with a liaison at NYPD to determine the status of the investigation, and also to obtain whatever materials are available. To date, the undersigned has not received a confirmation as to the status of the investigation or any materials. Defendants respectfully request an additional week, until February 5, 2021, to continue to search for this material and thereafter provide an update to plaintiff's counsel, and then submit a joint application to the Court.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Omar J. Siddiqi  
*Senior Counsel*

cc: Gabriel Paul Harvis (By ECF)  
Baree N Fett (By ECF)  
*Attorneys for Plaintiff*